

BEFORE THE TOWN PUBLIC  
EMPLOYMENT RELATIONS BOARD

In the matter of Fact Finding between

**Dubuque County**  
**Employer**

and

**Teamsters Local 421**  
**Union**

Case  
No.  
MIA-

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Appearances: Jill Hartley, for the Union

Mary Ann Specht, for the Employer

**Dubuque County Position**

1. The Employer proposes a 2% monthly employee cost share to begin 1-1-09 for health and dental premiums through pretax payroll deductions.

2. Dubuque County opposes the Union longevity pay proposal

**Teamsters Local 421 Position**

1. Teamsters Local 421 proposes a longevity schedule as follows:

- After 5 years \$500.00

- After 10 years \$1,000.00
- After 15 years \$1,500.00
- After 20 years \$2,000.00
- After 15 years \$3,000.00

2. Teamsters Local 421 proposes that Dubuque County pay the full cost of the premiums of the health and dental insurance premiums.

### **Union Position**

The Union takes the position that the employer pays 100% of the insurance for single and family plan for all of the employees in the sheriff's department. It has been doing so for some time as a result of prior negotiations and arbitration awards. Woodbury County pays 100% of the cost of the single and 100% of the cost of insurance for family of employees. Clinton County pays 100% of the cost of the single plan and 100% of the cost of the family plan. Johnson County, Scott County, Polk and Polk County pay 100% of the single plan. In Lynn County, Scott County and Polk County the employees pay part of the family coverage.

The Employer pays the Deputy Sheriffs longevity payments: after 5 years \$500.00 a

year, after 10 years \$1,000.00 a year, after 15 years \$1,500.00 a year, after 20 years \$2,000.00 a year, and after 30 years \$3,000.00 a year. The Employer does not make any proposal for the employees in this bargaining unit with regard to longevity.

The Employer is opposed to longevity pay for the employees in the bargaining unit. It contends the proposal for the thirteen employees employed in this bargaining unit would cost the Employer \$24,000.00 in fiscal year 2009 and that money has never been budgeted. The Employer argues that in relation to wages the salaries for the administrative employees ranked 7<sup>th</sup> in the state of Iowa. Since Dubuque County ranks 7<sup>th</sup> in population this data provides the basis for the Employers claim that wage parity has been demonstrated by Dubuque County. External comparisons shown only 5 of the 10 most populated counties provide longevity pay for this group of employees. Of the 5 that have this benefit, with the exception of Pottawattamie County, data shows that most annual longevity pay schedules are well below the proposal by the Union. The Employer points out that internal comparisons show that only one bargaining unit, with 66 employees out of 455 employees, are eligible for longevity pay out. No other bargaining unit has brought this issue forward as a bargaining proposal for this group of employees. The Employer points out that this benefit was gradually added to its employees through the collective bargaining process beginning with a \$500 longevity

payment in 1997. Dubuque County argues that wage parity has been met for this administrative group whose salaries are based on Dubuque County sheriff's pay as directed by the code of Iowa.

The Employer proposes to implement cost sharing beginning in January of 2009. There are thirteen employees in this bargaining unit and they rank 7<sup>th</sup> in the state of Iowa as far as basic wage roles are concerned. The Union points out that this bargaining unit supervises the Deputy Sheriffs and all of those Deputy Sheriffs receive fully paid insurance and they all receive longevity pay. The longevity pay has not been budgeted for this bargaining unit but the cost would not be implemented until July of 2009. The most recent arbitration award for the Deputy Sheriffs has the county continuing to pay the full cost of insurance and the full cost of longevity. Those employees are supervised by the Administrative Deputies. An arbitrator gave the Deputy Sheriffs a 6% increase in wages and the Employer pays the full cost of insurance and provides them with a longevity benefit similar to the longevity sought by the Union. The Union takes the position that it's membership should receive the same treatment with respect to health insurance and longevity that is received by the employees they supervise. Many members of the bargaining unit of Administrative Deputies were formerly Deputy Sheriffs before they became Administrative Deputies

and they no longer receive longevity. The Union's proposal would provide them with longevity payments and full payments of the insurance.

The Employer points out that the Union has achieved economic improvements even though they did not get longevity or full payments of insurance.

Dubuque County is located on the western banks of the Mississippi River and Northeastern Iowa. It has a population of approximately 90,000 based on the 2000 census. There are 21 cities in the county and 17 townships. The largest city is Dubuque with its population of 57,686. The county government for this bargaining unit is headquartered in a refurbished courthouse. Average per capita income in 1999 comparisons with other employees and other cities provides a dominant method for resolving wage disputes throughout the nation. The most powerful influence linking together separate wage bargains into an independent system is the force of equitable comparisons. Arbitrators have long used comparisons as a way of giving wage determinations some sense of rationality. Comparisons can provide a precision and objectivity that highlight the reasonableness or lack of it in a party's wage proposal. Internal comparability is more compelling than external comparables. The Arbitrator that gave the award in the Deputy Sheriff arbitration recommended a longevity

schedule such as proposed by the Union. The Employers proposal for this Union seems completely unfair to the management employees of the sheriff's department. It seems particularly unfair to deny the Administrative Deputies the longevity benefit and the full payment of health insurance that is now received by the Deputy Sheriffs. As a matter of fact some of the members of this bargaining unit came from the Deputy Sheriffs recently and they are accustomed to receiving full payments of health insurance and receiving longevity payments too. It seems particularly unfair to deny supervisors in this bargaining unit the benefit of fully paid insurance and the benefit of longevity and give their Administrative Deputies a promotion in status and deny them the full payment of health insurance and the longevity payments that the members of the bargaining unit they supervise all receive. The Employer maintains that it is not reasonable for employees to be held harmless from continuing increase in health and dental insurance. However it is more unreasonable to provide free insurance and longevity to one group of employees while denying it to employees that supervise that same group. On balance I find that the Employer would benefit from some semblance of parity between this bargaining unit and the Deputy Sheriff because morale problems among the employees would be lessened if not eliminated. Accordingly I recommend that the Employer continue to pay the full cost of the premiums for the health and dental insurance for the life of the agreement and the Union proposal of longevity of

\$500.00 after 5 years, \$1,000.00 after 10 years, \$1,500.00 after 15 years, \$2,000.00 after 20 years, and \$3,000.00 after 30 years be implemented for the period of the contract and the Employer continue full payment of the health and dental insurance premiums for the members of this bargaining unit.

I certify that on the 19<sup>th</sup> day of August, 2008 I served the forgoing Report of Fact Finder upon each of the parties by mailing a copy to them at their respective address as shown below.

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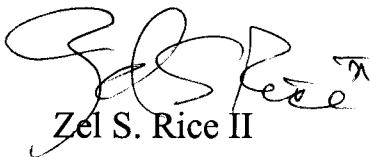
Administrative Law Judge

510 East 12<sup>th</sup> Street, Suite 113

Des Moines, IA 50319-0203

The parties have waived the 15-day requirement that the Fact Finder submit this report.

Respectfully submitted this 19<sup>th</sup> day of August, 2008

  
Zel S. Rice II

Fact Finder

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